

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

Premalall Nandkishur

Debtor.

**NOTICE OF MOTION FOR
TERMINATION OF AUTOMATIC STAY**

Case No.: 24-41964-nhl
(Chapter 13)

Assigned to:
Hon. Nancy Hershey Lord
Bankruptcy Judge

Please take notice that Rushmore Servicing as servicing agent for UMB Bank, National Association, not in its individual capacity, but solely as legal title trustee for LVS Title Trust XIII, a secured creditor of Debtor, by the undersigned attorneys, will move this Court on December 4, 2024 at 10:30 am or as soon thereafter as counsel can be heard telephonically at 1 (888) 363-4734, access code 4702754 for an (1) Order pursuant to 11 U.S.C §105(a) granting in rem relief as to the real property commonly known as 91 04 175th Street, Jamaica, NY 11432 (2) an Order pursuant to 11 U.S.C. § 362(d)(4)(B) terminating the automatic stay as to movant's interest in in real property commonly known as 91 04 175th Street, Jamaica, NY 11432 and for such other relief as the Court may deem proper.

PURSUANT TO LOCAL BANKRUPTCY RULE 9006-1(a), ANY ANSWERING PAPERS ARE TO BE SERVED SO AS TO BE RECEIVED BY THE SECURED CREDITOR'S COUNSEL NO LATER THAN 7 DAYS BEFORE THE HEARING DATE.

PLEASE TAKE FURTHER NOTICE that the hearing shall not be held in person but shall be held telephonically using the Webex Audio Video platform. Procedures and guidelines for remote appearances using the Cisco Webex meeting can be found on <https://www.nyeb.uscourts.gov/procedures-and-guidelines-remote-appearances-using-cisco-webex-meetings>.

DATED: October 22, 2024
Williamsville, New York

Yours,

/s/ Ehret Van Horn

By:

Ehret Anne Van Horn, Esq.
GROSS POLOWY LLC
Attorneys for Secured Creditor
Rushmore Servicing as servicing agent for
UMB Bank, National Association, not in its
individual capacity, but solely as legal title
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1775 Wehrle Drive, Suite 100
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Telephone (716) 204-1700

TO:

Premalall Nandkishur
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Brooklyn, NY 11236

Pro Se Debtor

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Chapter 13 Trustee

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Eastern District of Ny (Brooklyn)
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U.S. Trustee